

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

BARRY S. MILLER, ESQ.
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Attorney for Debtor

In Re:

MAHESH A. PATEL
YOGINI PATEL

Debtors.

Case No.: 21-14906

Hearing Date: 8/12/21

Chapter 13

Judge: JKS

**REPLY CERTIFICATION IN RESPONSE TO TRUSTEE'S OBJECTION TO
CONFIRMATION OF PLAN**

Barry S. Miller, of full age, hereby certifies as follows:

1. I am an attorney at law in the State of New Jersey. I represent the Debtors.
2. As to the trustee's first bullet point, with a modified plan having been filed today (Doc 22), the plan now does conform to 11 U.S.C. Section 1325(a)(4).
3. As to the trustee's second and third bullet points, the plan is now feasible pursuant to 11 U.S.C. Section 1325(a)(6) based on the modified schedules (I and J) that I filed today (Doc 21).

4. As to the trustee's fourth bullet point, I uploaded to 13documents.com all of the requested proof of income yesterday and today.
5. As to the trustee's fifth bullet point, I uploaded the requested proof of income to 13documents.com yesterday.
6. As to the trustee's sixth bullet point, I amended Schedule C today (Doc 21) to change the exemption statute to which I believe now properly responds to the trustee's objection by exempting the severance pay pursuant to 11 U.S.C. Section 522 (d)(10)(C) and 11 U.S.C. Section 522 (d)(10)(E).
7. As to the trustee's last bullet point, I amended Schedule I today (Doc 21) to reflect the addition of unemployment income and family contribution income following Mahesh Patel's recent loss of his job.
8. For the above reasons, I respectfully request that the Debtor's Plan be confirmed with all of the modified filings.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: August 5, 2021

By: /s/ Barry S. Miller
Barry S. Miller, Esq.
Attorney for the Debtor